

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

GENESIS MARINE, LLC
Plaintiff

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VERSUS

CIVIL ACTION NO. 4:21-cv-00289

SGR ENERGY, INC.
Defendant

RESPONSE TO SHOW CAUSE ORDER

NOW INTO COURT, through undersigned counsel, comes plaintiff, Genesis Marine, LLC (“Genesis”), which files this response to the Court’s February 24, 2022 SHOW CAUSE order.

Genesis shows that in fact the bankruptcy case filed by SGR Energy Inc. was dismissed by the bankruptcy court on January 21, 2022, and that the correct reading of that document is that SGR cannot file another bankruptcy proceeding until 60 days from that date, or until March 22, 2022. In other words, the bankruptcy court’s January 21, 2022, order does not state that the bankruptcy case will be dismissed sixty days from January 21, 2022, but the purpose of the order was to preclude SGR from “running” back to the bankruptcy court for at least the sixty days “with prejudice” period.

Genesis notes that the bankruptcy case was dismissed as a result of SGR’s own motion to dismiss. See Exhibit 1.

Accordingly, there is no automatic stay in place, and Genesis seeks to execute on its judgment now as it is entitled to do.

Respectfully submitted,

PHELPS DUNBAR LLP

BY: /s/ E. Martin McLeod
Evans Martin McLeod, Fed ID 411950
Canal Place | 365 Canal Street, Suite 2000
New Orleans, Louisiana 70130
Telephone: 504 566 1311
Facsimile: 504 568 9130
Email: marty.mcleod@phelps.com

ATTORNEY-IN-CHARGE FOR GENESIS
MARINE, LLC

OF COUNSEL:

PHELPS DUNBAR, LLP
Justin C. Warner, Fed. ID 3326606
Arthur R. Kraatz, Fed. ID 2895505
365 Canal Street, Suite 2000
New Orleans, LA 70130
Telephone: (504) 56601311
Facsimile: (504) 568-9130
Email: justin.warner@phelps.com
arthur.kraatz@phelps.com

CERTIFICATE OF SERVICE

I certify that on this 25th day of February, 2022, a true and correct copy of the foregoing instrument has been served upon all counsel of record via CM/ECF.

/s/ E. Martin McLeod
Of Phelps Dunbar, LLP